

February 24, 2011

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BY ELECTRONIC FILING

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12 Street, S.W.
Washington, D.C. 20554

Re: Revised Certificate Pursuant To Section 64.2009(e) of the Commission's Rules - Korea
Telecom America, Inc. – Docket No. EB-06-36.

Dear Ms. Dortch:

Attached is a revised certificate required pursuant to Section 64.2009(e) of the Commission's
rules filed by and on behalf of Korea Telecom America, Inc.

This replaces and supersedes the filing made on February 8, 2011 in this Docket, which should
be deleted from the Docket.

Please direct any questions to the undersigned.

Sincerely,



Paul C. Besozzi
Counsel to Korea Telecom America, Inc.

cc: Mr. Taisik Kim
Hwan Kim, Esquire
Chief, Telecommunications Consumers Division, Enforcement Bureau

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2010

Date Filed: February 23, 2011

Name of company covered by this certification: Korea Telecom America, Inc.

Form 499 FilerID: 821756

Names and Titles of Signatories:

Kyungmin Song, CEO
Taisik Kim, Executive Director

I, Kyungmin Song, CEO of Korea Telecom America, Inc., certify that I am a president of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See* 47 C.F.R. § 64.2001 *et seq.*

I, Taisik Kim, Executive Director of Korea Telecom America, Inc., certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See* 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions against data brokers in the past year.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

The company represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.



Kyungmin Song
CEO



Taisik Kim
Executive Director

Dated: February 23, 2011

**Statement Regarding Compliance with CPNI Regulations & Report
on Unauthorized Disclosure of CPNI**

The internal operating procedures and practices of Korea Telecom America, Inc. ("KTAI"), which are mandated by its parent company KT Corporation in Korea, ensure that KTAI complies with the Commission's rules at 47 C.F.R. § 64.2001 *et seq.*, governing the use and disclosure of Customer Proprietary Network Information ("CPNI"). KT AI's compliance with the Commission's CPNI rules is demonstrated by the policies, practices, and training procedures detailed below.

In connection with the use of CPNI for marketing purposes, KTAI's utilization of CPNI is limited to the marketing of offerings among the same categories of service to which the customers already subscribe. KT AI has established a review and approval process that calls for the records of such offerings to be maintained.

As a general rule, KTAI does not release or disclose customers' CPNI to third parties, but when it does so, it is only upon the customer's written consent as required by law or as described in the next paragraph. Without written consent, CPNI will only be disclosed if the request is made pursuant to a valid court order, warrant or appropriate notice from a government agency.

Other than as described above, KTAI will release or disclose customers' CPNI only for the express and limited purposes of initiating, rendering, billing and/or collecting for services provided by KT AI. In such cases, disclosure is only made pursuant to a written and binding agreement that contains restrictions regarding the confidentiality and safeguarding of customer information.

The customer service representatives of KT AI do not discuss or disclose customers' call detail records on customer-initiated telephone calls, except for the limited discussion of call detail records first identified by the customer.

KTAI does not provide any online access to customers' CPNI or call detail records until the customer requesting such information provides a password that has been established by the customer after that customer has been authenticated through a method that does not include the use of readily available biographical information. KTAI notifies a customer immediately whenever such customer's password, means of authentication, online account or address associated with the account is created or changed.

KT AI does not provide customers with access to call detail records at retail locations because KTAI sells pre-paid calling cards at retail locations.

KTAI does not provide customer call detail records to business customers.

KTAI also employs several internal operating processes and procedures to ensure compliance with KTAI privacy policies which are generally in compliance with the Commission's CPNI regulations. For instance, KTAI has developed extensive and detailed employee training manuals focusing on protecting the privacy of customers. KTAI has implemented and administers an employee disciplinary program to ensure compliance with internal procedures. Consequences for non-compliance include the potential termination of employees, when appropriate. KTAI has established processes for resolving customer complaints regarding unauthorized access to CPNI and

for identifying, responding to, documenting and, as appropriate, notifying law enforcement and customers of any breaches of customer CPNI. In addition, KTAI has developed educational materials to inform customers about CPNI protections and KT AI's authentication and protection practices.